



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

EPA Region 5 Records Ctr.



229892

November 3, 1998

REPLY TO THE ATTENTION OF

SR-6J

Mr. Clifton A. Lake, Esquire  
McBride, Baker & Coles  
500 West Madison Street  
40th Floor  
Chicago, Illinois 60661-2511

**VIA FACSIMILE AND  
REGULAR MAIL**

Dear Mr. Lake:

This letter provides the comments of the United States Environmental Protection Agency (U.S. EPA) on the revised version 2.0 of both the Site Health and Safety Plan and the Site Investigation Work Plan for the Fansteel facility located in North Chicago, Lake County, Illinois. The revised version 2.0 of both plans were prepared for Fansteel, Inc., by Carlson Environmental, Inc. (CEI), and are both dated October 1998.

1. **Health and Safety Plan (HASP):** Please revise the HASP to reflect the following comments.
  - 1.1 Any subcontractors working on site must develop their own HASP in accordance with 29 CFR §1910.120 Appendix C, structured so that it will smoothly interface with the program of the principle contractor. Usually, this is written in the form of an addendum, covering the specific activities the subcontractor will be doing, and appended to the site HASP. This HASP anticipates subcontractors for geoprobe work, any confined space work, or over-packing drums.
  - 1.2 Hearing protection is not listed in the personal protective equipment (PPE) list to be used.
  - 1.3 Because lead and cadmium are listed as possible site contaminants, the Occupational Safety and Health Administration (OSHA) expanded standards given in 29 CFR §1910.1025 for lead and 29 CFR §1910.1027 for cadmium should be referenced in the HASP. There are specific medical monitoring requirements in these regulations that must also be followed.
  - 1.4 The heat stress monitoring section has been revised to require employees to monitor themselves. During warmer conditions, there should be employer controls or oversight of this activity to ensure it is being done.
  - 1.5 The job hazard analysis section has bits and pieces of what is required, but is not activity specific. Under Physical Hazards, it lists chemicals. However, there is no mention of biological hazards.

November 3, 1998, Letter to Mr. Clifton A. Lake, Esq.

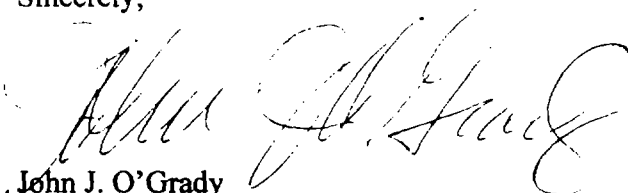
2. **SITE INVESTIGATION WORK PLAN**

- 2.1 **Reference: General Comment #3, July 20, 1998, Comment Letter:** Table One in Attachment B still does not include polycyclic aromatic hydrocarbon (PAH) analysis for soil samples. Soil samples should be analyzed for PAH compounds. Benzopyrene was one of the compounds that was above the risk assessment criteria for the Vacant Lot Site.
- 2.2 **Reference: General Comment #11, July 20, 1998, Comment Letter:** For compounds where the Illinois Environmental Protection Agency's (IEPA's) Tiered Approach to Cleanup Objectives (TACO) remediation objectives are not given, CEI has proposed to use the detection level of the compound as the action level and would consult the IEPA's Office of Chemical Safety to gather information and guidance for establishing remediation objectives. For evaluating remediation objectives for such compounds, a human health and ecological risk-based assessment should also be conducted. This kind of evaluation is the basis for the TACO remediation objectives.

CEI's and Great Lakes Analytical's Quality Assurance Project Plans (QAPP) have not yet been received. The U.S. EPA anticipates that review and comment on those documents may require as long as two months from the date of receipt, depending upon how well the QAPPs conform to the U.S. EPA guidance.

If you have any questions, please contact me at (312) 886-1477.

Sincerely,



John J. O'Grady  
Remedial Project Manager  
Superfund Division

cc: R. Nagam, E&E  
T. Krueger, U.S. EPA Region 5 Office of Regional Counsel